

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**J.W.** **PLAINTIFFS**

**V.** **CASE NO.: 3:21-cv-00663-CWR-LGI**

**THE CITY OF JACKSON, ET AL.** **DEFENDANTS**

*and*

**P.R., ET AL.** **PLAINTIFFS**

**V.** **CASE NO.: 3:21-cv-00667-CWR-LGI**

**THE CITY OF JACKSON, ET AL.** **DEFENDANTS**

*and*

**C.A., ET AL.** **PLAINTIFFS**

**V.** **CASE NO.: 3:22-cv-00171-CWR-LGI**

**THE CITY OF JACKSON, ET AL.** **DEFENDANTS**

---

**TONY YARBER AND KISHIA POWELL’S SECOND UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE REBUTTAL BRIEF IN SUPPORT OF DISPOSITIVE  
MOTION**

---

Defendants Tony Yarber and Kishia Powell ( “Yarber” and “Powell”), by and through their counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1), respectfully request an extension of time, through and including September 26, 2022, to file their Rebuttal Brief in Support of *Tony Yarber and Kishia Powell’s Motion for Qualified Immunity and to Dismiss* [21-663 ECF No. 82, 21-667 ECF No. 76, and 22-171 ECF No. 52], and further state as follows:

Plaintiffs’ *Response in Opposition* [Dkt. 113] and *Memorandum Brief in Opposition* [Dkt. 114] (collectively, the “Response in Opposition”) to *Tony Yarber and Kishia Powell’s Motion for*

*Qualified Immunity and to Dismiss* [21-663 ECF No. 82, 21-667 ECF No. 76, and 22-171 ECF No. 52] were filed on August 22, 2022.

Pursuant to the Court's Text-Only Order entered September 12, 2022, Yarber and Powell's rebuttal brief in response to Plaintiffs' Response in Opposition is currently due on Monday, September 19, 2022.

Yarber, Powell, and their counsel require additional time to respond to the allegations and claims made by Plaintiff. Accordingly, Yarber and Powell respectfully request a seven (7) day extension of the deadline to file their rebuttal brief in response to Plaintiffs' Response in Opposition, up to and including September 26, 2022.

This motion is made in good faith, not for purposes of delay, and granting it will not prejudice any party. This extension of time will allow Yarber and Powell sufficient time to fully investigate the allegations and claims raised in Plaintiffs' Response in Opposition, confer with counsel, and prepare their rebuttal brief.

On September 15, Yarber and Powell's counsel conferred with Plaintiffs' counsel regarding the basis for this request and the need for an extension of time. Plaintiffs' counsel had no objection to a seven (7) day extension and provided Plaintiffs' consent to the requested extension.

For these reasons, Defendants Tony Yarber and Kishia Powell respectfully request that this Court grant their request for an extension of time to respond to Plaintiffs' Response in Opposition, up to and including September 26, 2022.

RESPECTFULLY SUBMITTED, this the 16<sup>th</sup> day of September, 2022.

*s/ Clarence Webster, III*

CLARENCE WEBSTER, III

OF COUNSEL:

Clarence Webster, III (MSB #102111)  
Kaytie M. Pickett (MSB #103202)  
Adam Stone (MSB #10412)  
JONES WALKER LLP  
190 E. Capitol Street, Suite 800  
Jackson, MS 39201  
Telephone: (601) 949-4900  
Facsimile: (601) 949-4804  
cwebster@joneswalker.com  
kpickett@joneswalker.com  
astone@joneswalker.com  
*Counsel for the City of Jackson*

Terris C. Harris (MSB #99433)  
THE COCHRAN FIRM-JACKSON, LLC  
197 Charmant Place, Suite 2  
Ridgeland, Mississippi 39157  
Telephone: (601) 790-7600  
tharris@cochranfirm.com  
*Counsel for Tony Yarber and  
Kishia Powell*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 16, 2022, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which served a copy of the foregoing on all counsel of record.

s/ Clarence Webster, III  
CLARENCE WEBSTER, III